

"UNITED SEAL"
UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NORTH CAROLINA
STATESVILLE DIVISION

FILED
CHARLOTTE, N.C.

FEB 26 2008

U.S. DISTRICT COURT
W. DIST. OF N.C.

UNITED STATES OF AMERICA

DOCKET NO.: 5:07-cr-50-V

SUPERSEDING BILL OF
INDICTMENT

v.

Violations:

- (1) RODERICK LAUADES BROWN
a/k/a "Roderick Lauades Brown
a/k/a "Roger"
- (2) ERIC WILFORD MORRISON
- (3) LOXOMONTE OBRIAN LEACH
a/k/a Laxomonte Obrian Leach
- (4) TENORIO DECHAS DAYE
a/k/a "Chaz"
- (5) CHAKIRIS LEGEORGE RAMSEY
- (6) JESSICA FRANCES BROWN
- (7) DANIEL GERRARD SHERRILL
- (8) JERRY WAYNE COWAN
- (9) KENNETH CHUCK LAWSON
- (10) MARCO FENNEL DAYE
- (11) SHELDON EUGENE WINFORD
- (12) CORRY LAMONT BRANDON
a/k/a "Clyde Brandon"
- (13) CHEKUMA KENYTA SANDERS
a/k/a "Kuma"
- (14) SAMUEL JUVON BOWENS
- (15) JOSHUA DEAN SHARPE
- (16) ROBERT LOUIS ALLISON

- 18 U.S.C. § 2
- 18 U.S.C. § 922(g)(1)
- 18 U.S.C. § 924(c)(1)
- 21 U.S.C. § 841(a)(1)
- 21 U.S.C. § 846

COUNT ONE

From at least in or about January 1998, and continuing to the present, in Iredell County and Mecklenburg County, within the Western District of North Carolina, and elsewhere,

- (1) RODERICK LAUADES BROWN**
a/k/a "Roderick Lauades Brown"
a/k/a "Roger"
- (2) ERIC WILFORD MORRISON**
- (3) LOXOMONTE OBRIAN LEACH**
- (4) TENORIO DECHAS DAYE**
a/k/a "Chaz"
- (5) CHAKIRIS LEGEORGE RAMSEY**
- (6) JESSICA FRANCES BROWN**
- (7) DANIEL GERRARD SHERRILL**
- (8) JERRY WAYNE COWAN**
- (9) KENNETH CHUCK LAWSON**
- (10) MARCO FENNEL DAYE**
- (11) SHELDON EUGENE WINFORD**
- (12) CORRY LAMONT BRANDON**
a/k/a "Clyde Brandon"
- (13) CHEKUMA KENYTA SANDERS —**
a/k/a "Kuma"
- (14) SAMUEL JUVON BOWENS**
- (15) JOSHUA DEAN SHARPE**
- (16) ROBERT LOUIS ALLISON —**

along with others known and unknown to the Grand Jury, including CHAD BRADLEY MOORE, RICKY JAMES BERRYMAN, JR., ALVONTARIO STURGIS, DARRELL MORRISON, LARRY ANDRE WINFORD, ERIC NORMAN, L'TODD HOUSTON, GREGORY LABRONZE KENNERLY, CHRISTOPHER ROSS KENNERLY, and ELIZABETH ANN NORMAN, did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons known and unknown to the Grand Jury to possess with intent to distribute one or more controlled substances, that is, a quantity of cocaine and cocaine base, commonly known as "crack cocaine," Schedule II controlled substances, violations of Title 21, United States Code, Section 841(a)(1).

2. Said offense involved 50 grams or more of a mixture and substance containing a detectable amount of cocaine base, commonly known as "crack cocaine."

3. Said offense involved 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine.

4. All in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(A).

COUNT TWO

On or about November 5, 2007, in Iredell County, within the Western District of North Carolina and elsewhere,

(1) RODERICK LAUADES BROWN
a/k/a "Roderick Lauades Brown"
a/k/a "Roger"

did knowingly and intentionally possess with intent to distribute a quantity of cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance.

2. Said offense involved 5 grams or more of a mixture and substance containing a detectable amount of cocaine base, commonly known as "crack cocaine."

3. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT THREE

On or about October 26, 2007, in Iredell County, within the Western District of North Carolina and elsewhere,

(11) SHELDON EUGENE WINFORD

did knowingly and intentionally possess with intent to distribute a quantity of cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance.

2. Said offense involved 5 grams or more of a mixture and substance containing a detectable amount of cocaine base, commonly known as "crack cocaine."

3. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT FOUR

On or about October 26, 2007, in Iredell County, within the Western District of North Carolina, and elsewhere,

(11) SHELDON EUGENE WINFORD

during and in relation to a drug trafficking crime, that is, conspiracy to possess with intent to distribute cocaine and cocaine base, a violation of Title 21, United States Code, Sections 846 and 841(a)(1), as charged in Count One of this Bill of Indictment, for which he may be prosecuted in a Court of the United States, did knowingly and unlawfully use and carry a firearm, that is, a 9-mm semi-automatic handgun, and in furtherance of such drug trafficking crime did possess said firearm.

All in violation of Title 18, United States Code, Section 924(c)(1).

COUNT FIVE

On or about October 12, 2007, in Iredell County, within the Western District of North Carolina, and elsewhere,

(9) KENNETH CHUCK LAWSON

did knowingly and intentionally possess with intent to distribute a quantity of cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance.

2. Said offense involved 5 grams or more of a mixture and substance containing a detectable amount of cocaine base, commonly known as "crack cocaine."

3. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT SIX

On or about October 10, 2007, in Iredell County, within the Western District of North Carolina and elsewhere,

(3) LOXOMONTE OBRIAN LEACH

having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: defendant was convicted on or about August 19, 2004 in the Iredell County, North Carolina Superior Court of possession with intent to sell cocaine, did knowingly and unlawfully possess a firearm, in and affecting interstate commerce, that is, a 7.62 caliber rifle.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT SEVEN

On or about September 28, 2007 in Iredell County, within the Western District of North Carolina and elsewhere,

(9) KENNETH CHUCK LAWSON

did knowingly and intentionally possess with intent to distribute a quantity of cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance.

2. Said offense involved 5 grams or more of a mixture and substance containing a detectable amount of cocaine base, commonly known as "crack cocaine."

3. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT EIGHT

On or about August 9, 2007 in Iredell County, within the Western District of North Carolina and elsewhere,

**(12) CORRY LAMONT BRANDON
a/k/a "Clyde Brandon"**

did knowingly and intentionally possess with intent to distribute a quantity of cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance.

2. Said offense involved a mixture and substance containing a detectable amount of cocaine base.

3. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT NINE

On or about August 2, 2007 in Iredell County, within the Western District of North Carolina and elsewhere,

**(12) CORY LAMONT BRANDON
a/k/a "Clyde Brandon"**

did knowingly and intentionally possess with intent to distribute a quantity of cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance.

2. Said offense involved a mixture and substance containing a detectable amount of cocaine base.

3. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TEN

On or about September 17, 2007, in Iredell County, within the Western District of North Carolina and elsewhere,

(3) LOXOMONTE OBRIAN LEACH

having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: defendant was convicted on or about August 19, 2004 in the Iredell County, North Carolina Superior Court of possession with intent to sell cocaine, did knowingly and unlawfully possess one or more of the following firearms, in and affecting interstate commerce: that is, a 12-gauge shotgun and 12-gauge ammunition, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT ELEVEN

On or about July 23, 2007, in Iredell County, within the Western District of North Carolina and elsewhere,

(10) MARCO FENNEL DAYE

did knowingly and intentionally possess with intent to distribute a quantity of cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance.

2. Said offense involved a mixture and substance containing a detectable amount of cocaine base.

3. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWELVE

On or about July 11, 2007, in Iredell County, within the Western District of North Carolina and elsewhere,

(5) CHAKIRIS LEGEORGE RAMSEY

did knowingly and intentionally possess with intent to distribute a quantity of cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance.

2. Said offense involved a mixture and substance containing a detectable amount of cocaine base.

3. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THIRTEEN

On or about July 30, 2007, in Iredell County, within the Western District of North Carolina and elsewhere,

(10) MARCO FENNEL DAYE

did knowingly and intentionally possess with intent to distribute a quantity of cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance.

2. Said offense involved a mixture and substance containing a detectable amount of cocaine base.

3. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FOURTEEN

On or about July 2, 2007, in Iredell County, within the Western District of North Carolina and elsewhere,

(5) CHAKIRIS LEGEORGE RAMSEY

did knowingly and intentionally possess with intent to distribute a quantity of cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance.

2. Said offense involved a mixture and substance containing a detectable amount of cocaine base.

3. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FIFTEEN

On or about May 9, 2006, in Iredell County, within the Western District of North Carolina and elsewhere,

(4) TENORIO DECHAS DAYE a/k/a "Chaz"

did knowingly and intentionally possess with intent to distribute a quantity of cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, and did aid and abet others, including DANIEL GERRARD SHERRILL, therein.

2. Said offense involved a mixture and substance containing a detectable amount of

cocaine base.

3. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT SIXTEEN

On or about May 25, 2007, in Iredell County, within the Western District of North Carolina and elsewhere,

(4) TENORIO DECHAS DAYE a/k/a "Chaz"

did knowingly and intentionally possess with intent to distribute a quantity of cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance.

2. Said offense involved 5 grams or more of a mixture and substance containing a detectable amount of cocaine base, commonly known as "crack cocaine."

3. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT SEVENTEEN

On or about May 21, 2007, in Iredell County, within the Western District of North Carolina and elsewhere,

(4) TENORIO DECHAS DAYE a/k/a "Chaz"

did knowingly and intentionally possess with intent to distribute a quantity of cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance.

2. Said offense involved a mixture and substance containing a detectable amount of cocaine base.

3. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT EIGHTEEN

On or about January 16, 2007, in Iredell County, within the Western District of North Carolina and elsewhere,

(11) SHELDON EUGENE WINFORD

did knowingly and intentionally possess with intent to distribute a quantity of cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance.

2. Said offense involved a mixture and substance containing a detectable amount of cocaine base.

3. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT NINETEEN

On or about December 19, 2006, in Iredell County, within the Western District of North Carolina and elsewhere,

(11) SHELDON EUGENE WINFORD

did knowingly and intentionally possess with intent to distribute a quantity of cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance.

2. Said offense involved a mixture and substance containing a detectable amount of cocaine base.

3. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY

On or about August 8, 2006, in Iredell County, within the Western District of North Carolina and elsewhere,

(5) CHAKIRIS LEGEORGE RAMSEY

did knowingly and intentionally possess with intent to distribute a quantity of cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance.

2. Said offense involved a mixture and substance containing a detectable amount of cocaine base.

3. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-ONE

On or about August 8, 2006, in Iredell County, within the Western District of North Carolina and elsewhere,

(5) CHAKIRIS LEGEORGE RAMSEY

did knowingly and intentionally possess with intent to distribute a quantity of cocaine.

2. Said offense involved a mixture and substance containing a detectable amount of cocaine.

3. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-TWO

On or about August 8, 2006, in Iredell County, within the Western District of North Carolina and elsewhere,

(5) CHAKIRIS LEGEORGE RAMSEY

during and in relation to a drug trafficking crime, that is, conspiracy to possess with intent to distribute cocaine and cocaine base, a violation of Title 21, United States Code, Sections 846 and 841(a)(1), as charged in Count One of this Bill of Indictment, for which he may be prosecuted in a Court of the United States, did knowingly and unlawfully use and carry a firearm, that is, a 9-mm semi-automatic handgun, and in furtherance of such drug trafficking crime, did possess said firearm.

All in violation of Title 18, United States Code, Section 924(c)(1).

COUNT TWENTY-THREE

On or about June 29, 2006, in Iredell County, within the Western District of North Carolina and elsewhere,

(8) JERRY WAYNE COWAN
(10) MARCO FENNEL DAYE

did knowingly and intentionally possess with intent to distribute a quantity of cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, and did aid and abet one another therein.

2. Said offense involved a mixture and substance containing a detectable amount of cocaine base.

3. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TWENTY-FOUR

On or about June 9, 2006, in Iredell County, within the Western District of North Carolina and elsewhere,

(8) JERRY WAYNE COWAN
(10) MARCO FENNEL DAYE

did knowingly and intentionally possess with intent to distribute a quantity of cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, and did aid and abet one another therein.

2. Said offense involved a mixture and substance containing a detectable amount of cocaine base.

3. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TWENTY-FIVE

On or about June 1 2006, in Iredell County, within the Western District of North Carolina and elsewhere,

**(5) CHAKIRIS LEGEORGE RAMSEY
(8) JERRY WAYNE COWAN**

did knowingly and intentionally possess with intent to distribute a quantity of cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, and did aid and abet one another therein.

2. Said offense involved a mixture and substance containing a detectable amount of cocaine base.

3. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TWENTY-SIX

On or about May 6, 2006 in Iredell County, within the Western District of North Carolina and elsewhere,

**(12) CORRY LAMONT BRANDON
a/k/a “Clyde Brandon”**

did knowingly and intentionally possess with intent to distribute a quantity of cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance.

2. Said offense involved a mixture and substance containing a detectable amount of cocaine base.

3. All in violation of Title 21, United States Code, Sections 841(a)(1) and

841(b)(1)(C).

COUNT TWENTY-SEVEN

On or about February 5, 2008 in Iredell County, within the Western District of North Carolina and elsewhere,

**(12) CORRY LAMONT BRANDON
a/k/a "Clyde Brandon"**

did knowingly and intentionally possess with intent to distribute a quantity of cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance.

2. Said offense involved a mixture and substance containing a detectable amount of cocaine base.

3. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-EIGHT

On or about September 28, 2007 in Iredell County, within the Western District of North Carolina and elsewhere,

**(9) KENNETH CHUCK LAWSON
(14) SAMUEL JUVON BOWENS**

did knowingly and intentionally possess with intent to distribute a quantity of cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, and did aid and abet one another therein.

2. Said offense involved 5 or more grams of a mixture and substance containing a detectable amount of cocaine base, commonly known as "crack cocaine".

3. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT TWENTY-NINE

On or about October 12, 2007 in Iredell County, within the Western District of North Carolina and elsewhere,

**(9) KENNETH CHUCK LAWSON
(14) SAMUEL JUVON BOWENS**

did knowingly and intentionally possess with intent to distribute a quantity of cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, and did aid and abet one another therein.

2. Said offense involved 5 or more grams of a mixture and substance containing a detectable amount of cocaine base, commonly known as “crack cocaine”.

3. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT THIRTY

On or about January 31, 2008 in Iredell County, within the Western District of North Carolina and elsewhere,

**(14) SAMUEL JUVON BOWENS
(15) JOSHUA DEAN SHARPE**

did knowingly and intentionally possess with intent to distribute a quantity of cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, and did aid and abet one another therein.

2. Said offense involved 5 or more grams of a mixture and substance containing a detectable amount of cocaine base, commonly known as "crack cocaine".

3. All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2.

NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE

Notice is hereby given of the provisions of 18 U.S.C. §924(d) and §982, 21 U.S.C. §853, and 28 U.S.C. §2461(c). Under §2461(c), criminal forfeiture is applicable to any offenses for which forfeiture is authorized by any other statute, including but not limited to 18 U.S.C. §981 and all specified unlawful activities listed or referenced in 18 U.S.C. §1956(c)(7), which are incorporated as to proceeds by §981(a)(1)(C). As alleged in the counts charged above in this indictment, respectively, the defendant(s) has or had a possessory or legal interest in the following property that is subject to forfeiture in accordance with §982 and/or §2461(c):

- (a) all property involved in the violations alleged in this bill of indictment;
- (b) all property which is proceeds of such violations; and,
- (c) in the event that any property described in (a) or (b) cannot be located or recovered or has been substantially diminished in value or has been commingled with other property which cannot be divided without difficulty, all other property of the defendant, to the extent of the value of the property described in (a) and (b).

The grand jury finds probable cause to believe that the following property is subject to forfeiture on one or more of the grounds stated above: all currency and monetary instruments which were received during, involved in or used or intended to be used to facilitate the crimes alleged in this bill of indictment, including but not limited to the sum of \$3520 in United States

currency seized on or about February 12, 2008, from defendant Eric Wilford Morrison.

A TRUE BILL:


GRETCHEN C. F. SHAPPERT
UNITED STATES ATTORNEY